

## REMARKS

Claims 1 – 20, 22, and 24 are in the application. Claims 1, 22, and 24 are currently amended; claims 21 and 23 are canceled; and claims 2 – 20 remain unchanged from the original versions thereof. Claims 1, 22, and 23 are the independent claims herein.

Claims 1, 22, and 24 are further amended as indicated on the listing of the claims submitted herewith to further clarify that which is claimed by Applicant. No new matter has been added to the application as a result of the amendments submitted herewith.

Reconsideration and further examination are respectfully requested.

### **Claim Rejections – 35 USC § 103**

Claims 1 – 20 and 22 were rejected under 35 U.S.C. 103(a) as being unpatentable over Lewis U.S. Patent No. 6,513,019 B2 in view of Borkovsky, U.S. Patent No. 6,556,991 B1 in view of Tan, (Victor S. L. Tan “Early Warning System Important.” New Straits Times. Kuala Lumpur: Apr 22, 1998, pg 12). This rejection is traversed.

Applicant notes that claim 1 relates to a method for monitoring financial exposure in an entity having a plurality of operating units. The method includes

- gathering information about each of said operating units including at least one product identifier associated with each of said plurality of operating units and at least one collateral identifier associated with each of said plurality of operating units;
- mapping said at least one product identifier to a standardized product identifier of the entity having the plurality of operating units associating product nomenclature from each of the plurality of operating units with product nomenclature of the entity;

- mapping said at least one collateral identifier to a standardized collateral identifier of the entity by associating collateral nomenclature from each of the plurality of operating units with collateral nomenclature of the entity;
- receiving, from each of said plurality of operating units, unit exposure data identifying an exposure of said operating unit to at least a first customer of said operating unit based on said standardized product identifier and said standardized collateral identifier; and
- generating aggregated exposure information for said entity related to said at least one customer to indicate a financial exposure of the entity as related to said at least one customer across the plurality of operating units. Claim 22 is worded similar to claim 1.

Regarding Lewis, the Office Action cites the cited and relies on the following,

Risk-exposure, inventory, liquidity, and the like-is dynamically altered with each transaction. Numerous functions within the firm have substantial interest in seeing these details-and quickly. For example, firms are particularly concerned with knowing the availability and location of all collateral that can be used to raise funds quickly in the event of a liquidity shortage, and on the most favorable terms. The risk manager also seeks the firm's, or a counterparty's, total position and cash versus each counterparty and currency, integrated with current and complete details (i.e., "market data") of each financial instrument that is traded in customer portfolios or in the firm's inventory, to input into automated risk assessments. Based on the resulting information, the risk manager acts to rebalance positions of the firm or the customer so that its exposure may be reduced. The sooner the inputs can be gathered, standardized, aggregated, and consolidated, the sooner the risk assessment can be performed and corrective action can be taken. (Lewis, col. 3, ln. 1 – 17)

and

It is another object of the present invention to provide a computer system that receives incoming stochastic data records from plural disparate systems and data sources relating to financial transactions, financial instruments, customers, counterparties, employees, organizational units, and financial institutions; converts this disparate data into a common

format; and derives information from the data; consolidates and integrates the data and information on a database that is defined according to a comprehensive financial industry data model; distributes the data and information electronically and automatically publishes the data and information to subscribers; and provides access to this data and information for real-time inquiry by various functional areas and customers of a financial services enterprise. (Lewis, col. 3, ln. 1 – 17)

The portions of Lewis provided hereinabove, cited and relied upon by the Office, fail to disclose or even suggest that for which it is cited for disclosing. In particular, Lewis fails to disclose or even suggest the alleged “gathering of information about each of the operating units including at least one product identifier...” since no mention is made of product identifiers associated with the claimed operating units; the alleged “mapping said at least one collateral identifier to a standardized collateral identifier” and the “mapping said at least one collateral identifier to a standardized collateral identifier” since Lewis does not disclose or suggest any mapping between product and collateral identifiers and standardized product and collateral identifiers; or alleged “receiving, from each of said plurality of operating units, unit exposure data identifying an exposure of said operating unit...” since Lewis does not disclose or suggest the claimed exposure of specific operating units.

Thus, it is clear that Lewis fails to disclose that for which it was particularly cited for disclosing.

Regarding Borkovsky, Applicant respectfully submits that Borkovsky absolutely fails to disclose or even suggest the claimed mapping at least one product identifier to a standardized product identifier of the entity having the plurality of operating units by associating product nomenclature from each of a plurality of the operating units since the Borkovsky ‘item name variants’ in a ‘cluster of item names’ are merely mapped to a ‘normalized item name’ (Borkovsky, FIG. 3A, 306) For example, the item name variants listed in cluster 350 (355) are mapped to normalized name 360 (365) in FIG. 3B and the item name variants listed in cluster 375 are mapped to normalized name 380 in FIG. 3C. Applicant reiterates however that there is no disclosure or even a suggestion that

the 'clusters of item names' are determined based on any operating unit of an entity including a plurality of operating units. (Borkovsky, FIG. 3A, 302)

Applicant respectfully disagrees with the Office Action's assessment that Borkovsky discloses an association of a name variant and a normalized name for the item regarding an operating unit, as stated in the *Response to Arguments* section of the Office Action. First, the Office Action asks Applicant to "assume that each item name variant in table 110 is extracted from a different shopping catalog". Applicant points out that if Borkovsky in fact disclosed such, then there would be no need to assume the hypothetical scenario created in the Office Action. Therefore, it is clear that Borkovsky does not disclose that which the Office Action stated Borkovsky discloses.

Next, even if it is assumed "that each item name variant in table 110 is extracted from a different shopping catalog" (suggested and relied upon by the Office, not admitted as feasible by Applicant), it remains to be shown that each normalized name is associated with an operating unit. The Examiner's hypothetical abstraction fails to show or prove each normalized name is associated with an operating unit since the different catalogs could very likely (most likely) be associated with the same operating units of a company. Furthermore, the Office Action provides no proof that different catalogs in Borkovsky are even associated with different operating units. The Examiner's fails for example since one operating unit is probably or likely responsible for the various catalogs published by a company. At any rate, it remains fact that Borkovsky does not segment or make any distinction between operating units (e.g., winter catalog, summer catalog, holiday catalog, outerwear, luggage, etc.) when mapping item variant names to a normalized name (e.g., lands End), as illustrated in the example of FIG. 3B.

Thus, it is also clear that Borkovsky fails to disclose or suggest the claimed mapping said at least one product identifier to a standardized product identifier of the entity having the plurality of operating units associating product nomenclature from each of the plurality of operating units with product nomenclature of the entity.

Applicant further submits that combining the cited and relied upon Lewis, Borkovsky, and Tan as alleged in the Office Action fails to correct the deficiencies of Lewis and/or Borkovsky.

Therefore, Applicant respectfully submits that claims 1 and 22 are not anticipated by Lewis, Borkovsky, and Tan under 35 USC 103(a). Claims 2 – 20 depend from claim 1. Applicant submits that claims 2 – 20 depending from claim 1 are patentable over Lewis, Borkovsky, and Tan for at least depending from an allowable base claim.

Accordingly, the reconsideration and withdrawal of the rejection of claims 1 – 20 and 22 under 35 USC 103(a) are respectfully requested, as well as the allowance of same.

Claim 24 was rejected under 35 U.S.C. 103(a) as being unpatentable over Lewis in view of Borkovsky. This claim is respectfully traversed.

Inasmuch as the claims 1 – 20 and 24 discussed hereinabove are clearly shown to claim that which is not disclosed or suggested by the combination of Lewis and Borkovsky, Applicant respectfully submits that Lewis fails to disclose, at least, the mapping aspects of claim 24.

Accordingly, the reconsideration and withdrawal of the rejection of claim 24 under 35 USC 103(a) is respectfully requested, as well as the allowance of same.

## CONCLUSION

Accordingly, Applicants respectfully request allowance of the pending claims. If any issues remain, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is kindly invited to contact the undersigned via telephone at (203) 972-5985.

Respectfully submitted,

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Date

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